

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

NO. 3:CR-18- 247

-vs- :

KURT DOWNS, :  
Defendant :

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(Assault on an Inmate Resulting In Serious Bodily Injury)

On or about February 15, 2018, within the Middle District of  
Pennsylvania, the Defendant,

KURT DOWNS,

at a place within the territorial jurisdiction of the United States,  
namely, the United States Penitentiary at Canaan, Pennsylvania, on  
land acquired for the use of the United States and under its concurrent  
jurisdiction, did knowingly and intentionally assault another inmate,  
K.W., without justification or excuse, and resulting in serious bodily  
injury to the victim.

In violation of Title 18, United States Code, Sections 7(3), 113  
(a)(6).

FILED  
SORANTON  
JUL 24 2018  
PER DEPUTY CLERK

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

**(Assault of an Inmate by Striking, Beating or Wounding)**

On or about March 11, 2018, within the Middle District of Pennsylvania, the Defendant,

**KURT DOWNS,**

at a place within the territorial jurisdiction of the United States, namely, the United States Penitentiary at Cannan, Pennsylvania, on land acquired for the use of the United States and under its concurrent jurisdiction, did knowingly and intentionally assault another inmate, P.D., without justification or excuse, by striking, beating or wounding the victim.

In violation of Title 18, United States Code, Sections 7(3), 113 (a)(4).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**  
**(Assault of a Corrections Officer)**

On or about March 11, 2018, at the United States Penitentiary at Canaan, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

**KURT DOWNS,**

did knowingly and intentionally forcibly assault, resist, oppose, impede, intimidate, and interfere with a Correctional Officer, C.W., employed by the United States Bureau of Prisons, an agency of a branch of the United States government, as designated in Title 18, United States Code, Section 1114, while he was engaged in the performance of his official duties, with such acts of the Defendant involving physical contact with the Correctional Officer victim.

In violation of Title 18, United States Code, Section 111(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 4  
(Assault of a Corrections Officer)

On or about March 11, 2018, at the United States Penitentiary at Canaan, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

KURT DOWNS,

did knowingly and intentionally forcibly assault, resist, oppose, impede, intimidate, and interfere with a Correctional Officer, J.S., employed by the United States Bureau of Prisons, an agency of a branch of the United States government, as designated in Title 18, United States Code, Section 1114, while he was engaged in the performance of his official duties, with such acts of the Defendant involving physical contact with the Correctional Officer victim.

In violation of Title 18, United States Code, Section 111(a).

 A TRUE BILL:

DAVID J. FREED

United States Attorney

By: 

FRANCIS P. SEMPA

Assistant U.S. Attorney